

1 Patricia A. Matias (SBN 254125)  
2 Rochelle N. Miller (SBN 352528)  
JACKSON LEWIS P.C.  
200 Spectrum Center Drive, Suite 500  
3 Irvine, CA 92618  
4 Tel: (949) 885-1360  
Fax: (949) 885-1380  
5 Patricia.Matias@JacksonLewis.com  
Rochelle.Miller@JacksonLewis.com

6 Attorneys for Defendant  
7 OPTUM SERVICES, INC.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11 LAURA PATRICIA MARTINEZ, an  
individual;

12 Vs. Plaintiff,  
13

14  
15 UNITED HEALTH GROUP, INC.;  
OPTUM SERVICES, INC.; OPTUM,  
INC.; MARION COLEMAN, an  
individual; DOES 1 through 100,  
Inclusive.

16 Defendants.

17 Case No. 5:24-cv-690

18 **DECLARATION OF LISA HOLMES IN  
SUPPORT OF DEFENDANT'S NOTICE  
OF REMOVAL TO THE UNITED  
STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA,  
PURSUANT TO 28 U.S.C. 1332, 1441,  
AND 1446.**

19 [Filed concurrently with Notice of Removal;  
Civil Case Cover Sheet; Notice of Interested  
Parties; and Corporate Disclosure Statement]

20 State Complaint Filed: February 13, 2024

21 **DECLARATION OF LISA HOLMES**

22 I, Lisa Holmes, hereby declare:

23 1. I am over twenty-one (21) years of age and competent to testify to the matters  
contained herein. This Declaration is based upon my own personal knowledge or my  
knowledge and review of the contents of the relevant business records, systems, and files.  
I am submitting this declaration in support of Defendant Optum Services, Inc.'s Notice of  
Removal.

24 2. I am currently employed by Defendant Optum Services, Inc. as a Senior  
Director, People Team. By virtue of my position, I am familiar with Defendants

1 UnitedHealth Group Incorporated, Optum Services, Inc., and Optum, Inc. and their  
2 corporate structures and operations.

3       3. Defendant UnitedHealth Group Incorporated is a Delaware corporation that  
4 maintains its principal place of business in Minnetonka, Minnesota.

5       4. Defendant Optum Services, Inc. is a Delaware corporation that maintains its  
6 principal place of business in Eden Prairie, Minnesota.

7       5. Defendant Optum, Inc. is a Delaware corporation that maintains its principal  
8 place of business in Eden Prairie, Minnesota.

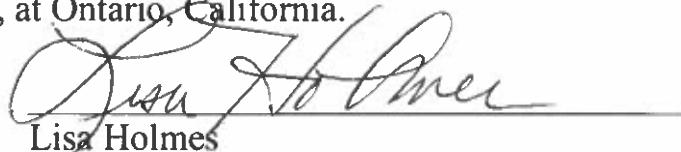
9       6. In my capacity as a Senior Director, People Team, I am familiar with and have  
10 access to information and data regarding the general business operations of Defendant  
11 Optum Services, Inc. I also have access to employee personnel files, payroll records, and  
12 human resources systems, which are maintained in the ordinary course of business. Entries  
13 on those records and in those systems are made in a timely manner by people with  
14 knowledge of the information being entered, and it is the regular practice of my department  
15 to maintain such records. Contained within Ms. Martinez's personnel file and our human  
16 resources systems is information reflecting Ms. Martinez's address as 68430 Perlita Road,  
17 Cathedral City, CA 92234.

18       7. Upon review of her information in our human resources systems, Ms.  
19 Martinez's hourly rate was \$18.44 on January 2, 2022, which was her last day of  
20 employment. As an hourly employee, she earned approximately \$38,355 per year and  
21 between her last day of employment on January 2, 2022, and the present, she would have  
22 earned over \$86,299.

23       8. Contained within Defendant Marion Coleman's personnel file and our human  
24 resources systems is information reflecting Ms. Coleman's position as a Preservice Review  
25 Nurse LPN. In this position, Ms. Coleman was not an owner or officer of Defendant  
26 UnitedHealth Group Incorporated, Optum Services, Inc. or Optum, Inc. and she had no  
27 oversight over or influence on their operations or corporate policies.

1 I declare under the laws of the United States and the State of California that the  
2 foregoing is true and correct to the best of my knowledge.

3 Executed this 7<sup>th</sup> date of April 2024, at Ontario, California.  
4

5   
6 Lisa Holmes